



6560-50-P

ENVIRONMENTAL PROTECTION AGENCY

[EPA–HQ– OAR-2020-0404; FRL 10013-80-OAR]

Alternative Methods for Calculating Off-cycle Credits under the Light-duty Vehicle Greenhouse Gas Emissions Program: Application from American Honda Motor Company

AGENCY: Environmental Protection Agency (EPA).

ACTION: Notice.

SUMMARY: The Environmental Protection Agency (EPA) is requesting comment on an application from Honda Motor Company (“Honda”) for off-cycle carbon dioxide (CO₂) credits under EPA’s light-duty vehicle greenhouse gas emissions standards. “Off-cycle” emission reductions can be achieved by employing technologies that result in real-world benefits, but where that benefit is not adequately captured on the test procedures used by manufacturers to demonstrate compliance with emission standards. EPA’s light-duty vehicle greenhouse gas program acknowledges these benefits by giving automobile manufacturers several options for generating “off-cycle” CO₂ credits. Under the regulations, a manufacturer may apply for CO₂ credits for off-cycle technologies that result in off-cycle benefits. In these cases, a manufacturer must provide EPA with a proposed methodology for determining the real-world off-cycle benefit. Honda has submitted an application that describes a methodology for determining off-cycle credits from technologies described in their application. Pursuant to applicable regulations, EPA is making this off-cycle credit calculation methodology available for public comment.

DATES: Comments must be received on or before [INSERT DATE 30 DAYS AFTER DATE OF PUBLICATION IN THE FEDERAL REGISTER].

ADDRESSES: Submit your comments, identified by Docket ID No. EPA–HQ– OAR-2020-0404, to the Federal eRulemaking Portal: <https://www.regulations.gov>. Follow the online instructions for submitting comments. Once submitted, comments cannot be edited or withdrawn. The EPA may publish any comment received to its public docket. Do not submit electronically any information you consider to be Confidential Business Information (CBI) or other information whose disclosure is restricted by statute. Multimedia submissions (audio, video, etc.) must be accompanied by a written comment. The written comment is considered the official comment and should include discussion of all points you wish to make. The EPA will generally not consider comments or comment contents located outside of the primary submission (i.e. on the web, cloud, or other file sharing system). For additional submission methods, the full EPA public comment policy, information about CBI or multimedia submissions, and general guidance on making effective comments, please visit <https://www2.epa.gov/dockets/commenting-epa-dockets>.

FOR FURTHER INFORMATION CONTACT: Linc Wehrly, Office of Transportation and Air Quality, Compliance Division, U.S. Environmental Protection Agency, 2000 Traverwood Drive, Ann Arbor, MI 48105. Telephone: (734) 214–4286. Fax: (734) 214–4869. Email address: wehrly.linc@epa.gov.

SUPPLEMENTARY INFORMATION:

I. Background

EPA's light-duty vehicle greenhouse gas (GHG) program provides three pathways by which a manufacturer may accrue off-cycle carbon dioxide (CO₂) credits for those technologies that achieve CO₂ reductions in the real world but where those reductions are not adequately captured on the test used to determine compliance with the CO₂ standards, and which are not otherwise reflected in the standards' stringency. The first pathway is a predetermined list of credit values for specific off-cycle technologies that may be used beginning in model year 2014.¹ This pathway allows manufacturers to use conservative credit values established by EPA for a wide range of technologies, with minimal data submittal or testing requirements, if the technologies meet EPA regulatory definitions. In cases where the off-cycle technology is not on the menu but additional laboratory testing can demonstrate emission benefits, a second pathway allows manufacturers to use a broader array of emission tests (known as "5-cycle" testing because the methodology uses five different testing procedures) to demonstrate and justify off-cycle CO₂ credits.² The additional emission tests allow emission benefits to be demonstrated over some elements of real-world driving not adequately captured by the GHG compliance tests, including high speeds, hard accelerations, and cold temperatures. These first two methodologies were completely defined through notice and comment rulemaking and therefore no additional process is necessary for manufacturers to use these methods. The third and last pathway allows manufacturers to seek EPA approval to use an alternative methodology for determining the off-cycle CO₂ credits.³ This option is only available if the benefit of the technology cannot be adequately demonstrated using

¹ See 40 CFR 86.1869-12(b).

² See 40 CFR 86.1869-12(c).

³ See 40 CFR 86.1869-12(d).

the 5-cycle methodology. Manufacturers may also use this option to demonstrate reductions that exceed those available via use of the predetermined list.

Under the regulations, a manufacturer seeking to demonstrate off-cycle credits with an alternative methodology (i.e., under the third pathway described above) must describe a methodology that meets the following criteria:

- Use modeling, on-road testing, on-road data collection, or other approved analytical or engineering methods;
- Be robust, verifiable, and capable of demonstrating the real-world emissions benefit with strong statistical significance;
- Result in a demonstration of baseline and controlled emissions over a wide range of driving conditions and number of vehicles such that issues of data uncertainty are minimized;
- Result in data on a model type basis unless the manufacturer demonstrates that another basis is appropriate and adequate.

Further, the regulations specify the following requirements regarding an application for off-cycle CO₂ credits:

- A manufacturer requesting off-cycle credits must develop a methodology for demonstrating and determining the benefit of the off-cycle technology and carry out any necessary testing and analysis required to support that methodology.
- A manufacturer requesting off-cycle credits must conduct testing and/or prepare engineering analyses that demonstrate the in-use durability of the technology for the full useful life of the vehicle.

- The application must contain a detailed description of the off-cycle technology and how it functions to reduce CO₂ emissions under conditions not represented on the compliance tests.
- The application must contain a list of the vehicle model(s) which will be equipped with the technology.
- The application must contain a detailed description of the test vehicles selected and an engineering analysis that supports the selection of those vehicles for testing.
- The application must contain all testing and/or simulation data required under the regulations, plus any other data the manufacturer has considered in the analysis.

Finally, the alternative methodology must be approved by EPA prior to the manufacturer using it to generate credits. As part of the review process defined by regulation, the alternative methodology submitted to EPA for consideration must be made available for public comment.⁴ EPA will consider public comments as part of its final decision to approve or deny the request for off-cycle credits.

II. Off-Cycle Credit Application: GHG Credit for Cold Storage Evaporator

Using the alternative methodology approach discussed in their application, Honda is applying for credits for all 2017 model year and later Honda and Acura vehicles for a cold storage evaporator system that results in idle start-stop credits beyond those provided in the regulations. Honda's cold storage evaporators utilize a paraffin wax

⁴ See 40 CFR 86.1869-12(d)(2).

material in the evaporator tank to sustain the evaporator's ability to absorb heat from the cabin air when the engine is shut off, consequently maintaining cooler air temperature and cabin comfort for a longer period of time during engine shutoff as compared to the shorter comfort period provided by a non-cold storage evaporator. The concept behind this strategy is similar to the use of alternative passenger warming technologies that maintain driver comfort longer during engine off events at *cold* ambient temperatures in order to delay engine startups for cabin heating. In particular, at ambient temperatures where air conditioning is used for cooling the cabin, Honda's cold storage evaporator implementation aims to reduce A/C compressor and engine use during both extended engine off vehicle stops and multiple short stops while also increasing the ambient temperature threshold above which the idle start-stop system is disabled in order to maintain cabin comfort.

Honda has provided a methodology for and test data from two different types of operational test conditions – extended stops and multiple stops – as well as an alternative calculation method that yields higher credit values than the primary method. Using the lower values from the primary evaluation and calculations, Honda is requesting EPA approval of an off-cycle GHG credit of 1.0 grams CO₂ per mile for the Cold Storage Evaporator equipped in MY 18-19 Honda Odyssey, 1.2 g/mile for the MY 17-19 Honda Pilot and Acura MDX & MY 19 Honda Passport AWD, 1.0 g/mi for the MY 19 Acura RDX AWD, 0.7 g/mi for MY 19 Honda Passport FWD and 0.6 g/mi for MY 17-19 Acura TLX & MY 19 Acura RDX FWD.

EPA has previously approved credits determined by alternative GHG credit calculation methods for idle start-stop systems for both Mercedes and Hyundai-Kia. Details of the methodology, testing and analysis can be found in Honda's application.

III. EPA Decision Process

EPA has reviewed the application for completeness and is now making the application available for public review and comment as required by the regulations. The off-cycle credit application submitted by Honda (with confidential business information redacted) has been placed in the public docket (see ADDRESSES section above) and on EPA's web site at <https://www.epa.gov/vehicle-and-engine-certification/compliance-information-light-duty-greenhouse-gas-ghg-standards>.

EPA is providing a 30-day comment period on the application for off-cycle credits described in this notice, as specified by the regulations. The manufacturer may submit a written rebuttal of comments for EPA's consideration, or may revise an application in response to comments. After reviewing any public comments and any rebuttal of comments submitted by manufacturers, EPA will make a final decision regarding the credit request. EPA will make its decision available to the public by placing a decision document in the docket and on EPA's web site at the same manufacturer-specific page shown above. While the broad methodologies used by Honda could potentially be used for other vehicles and by other manufacturers, the vehicle specific data needed to demonstrate the off-cycle emissions reductions would likely be different. In such cases, a new application would be required, including an opportunity for public comment.

Dated: August 14, 2020.

Mary Manners,

Acting Director, Compliance Division,

Office of Transportation and Air Quality,

Office of Air and Radiation.

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